

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Northern Division**

JEFFREY F. LAWRENCE, et al.

*

Plaintiffs

*

v.

*

Civil Action # RDB-02-CV-3224

THE “IMAGINE...!” YACHT, LLC,
et al.

*

*

Defendants

*

* * * *

THE “IMAGINE...!” YACHT, LLC

*

Third Party Plaintiff

*

v.

*

SHER & BLACKWELL, LLP

*

Third Party Defendant

*

* * * * *

CONSENT MOTION TO AMEND SCHEDULING ORDER

Defendant, the “IMAGINE . . . !” Yacht, LLC, by its attorneys, Robert H. Bouse, Jr. and Jonathan A. Cusson, hereby files this Motion to Amend Scheduling Order with the consent of all parties and for good cause states as follows:

1. Presently, the Scheduling Order, as entered by this Court on April 4, 2003, indicates that Defendant must designate experts by July 2, 2003, that Plaintiff must

disclose rebuttal experts by July 14, 2003, that Rule 26(e)(2) supplementation is due by July 23, 2003, that the discovery deadline is August 18, 2003, that requests for admission are due by August 25, 2003, and that the dispositive pretrial motions are due by September 15, 2003.

2. By an agreement of counsel, because of the factually intense nature of this action, including the anticipated need for multiple expert witnesses, the parties pray that the Scheduling Order be amended to add sixty (60) days to each deadline. The proposed deadline for Defendant to name its experts is July 31, 2003. The proposed deadline for Plaintiff to disclose rebuttal experts is August 7, 2003. The proposed deadline for Rule 26(e)(2) supplementation is August 14, 2003. The proposed discovery deadline for the submission of a status report is October 7, 2003. The proposed deadline for requests for admissions is October 14, 2003. Lastly, the proposed deadline for dispositive pretrial motions is November 4, 2003.

3. This Motion is made with the consent of all parties in an effort to facilitate discovery and may result in the resolution of this matter short of trial.

WHEREFORE, the parties pray that this Court grant their Consent Motion to Amend Scheduling Order as set forth herein.

Robert H. Bouse, Jr., #01926
Jonathan A. Cusson #27095
Anderson, Coe & King, LLP
201 North Charles Street
Suite 2000
Baltimore, Maryland 21201
(410) 752-1630

ORDER GRANTED AS PRAYED:

_____ day of _____, 2002

Richard D. Bennett, U.S. District Judge